

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

VICTORIA PUPO

(b) County of Residence of First Listed Plaintiff Philadelphia  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Brian M. Doyle- Law Offices of Eric A. Shore  
1500 JFk Blvd, Suite 1240  
Philadelphia, PA 19102

## DEFENDANTS

KHGR PHILLY MONACO, LLC.

County of Residence of First Listed Defendant Philadelphia  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C.A. § 2000e-2(a)

Brief description of cause:

Race Discrimination

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

9/23/2021

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: 2630 Welsh Road, Apt 5 Philadelphia PA 19152

Address of Defendant: 433 Chestnut Street, Philadelphia PA 19106

Place of Accident, Incident or Transaction: 433 Chestnut Street, Philadelphia PA 19106

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when *Yes* is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 9/23/2021

*[Signature]*  
Attorney-at-Law / Pro Se Plaintiff

319475 (PA)

Attorney I.D. # (if applicable)

**CIVIL: (Place a ☒ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☒ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases

*(Please specify):* \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury *(Please specify):* \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases

*(Please specify):* \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, Brian M. Doyle, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 9/23/2021

*[Signature]*  
Attorney-at-Law / Pro Se Plaintiff

319475 (PA)

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

VICTORIA PUPO

v.

KHGR PHILLY  
MONACO, LLC:  
:  
:  
:  
:  
:

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

9/23/2021

**Date**

215-944-6113

**Telephone****Attorney-at-law**

215-944-6124

**FAX Number**

Plaintiff

**Attorney for**

BrianD@ericshore.com

**E-Mail Address**

1

2. Defendant, KHRG Philly Monaco LLC. (“Defendant”) is a limited liability company which owns and operates the Hotel Monaco in Philadelphia County at 433 Chestnut Street, Philadelphia, PA 19106.

3. At all times, Defendant employed more than 15 individuals and met the statutory definition of an “employer” as defined by Title VII, the PHRA, and the PFPO.

#### JURISDICTION AND VENUE

4 This Complaint alleges discrimination on the basis of Pupo’s race, color, and national origin, in violation of Title VII, Section 1981, the PHRA, and the PFPO.

5. Declaratory relief is sought pursuant to 28 U.S.C. §§ 2201 and 2202.

6. This Honorable Court has jurisdiction of this matter, case and controversy pursuant to 28 U.S.C. §§ 1331, 1343(a)(4) and 42 U.S.C. § 2000e-5(f).

7. Venue is proper in the Eastern District of Pennsylvania pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to these claims occurred in this Judicial District.

#### ADMINISTRATIVE PROCEEDINGS

8. On or about March 16, 2021, Pupo filed a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”), which was docketed as EEOC Charge No. 530-2021-02697 and which was dual-filed with the Pennsylvania Human Relations Commission and the Philadelphia Commission on Human Relations, alleging discrimination and wrongful discharge from her employment due to the actions of Defendant.

9. Pupo has been advised of her individual right to bring a civil action by receiving a Notice of Rights from the EEOC, dated August 6, 2021 (attached hereto as Exhibit “A”).

10. Pupo has exhausted the administrative remedies available to her, and all necessary and appropriate administrative prerequisites to the filing of this Complaint have occurred and been satisfied.

#### OPERATIVE FACTS

11. Defendant hired Pupo on August 23, 2012 as a Room Attendant. In this capacity, Pupo was responsible for cleaning rooms at the Hotel Monaco.

12. Pupo is also a black-woman, who was born in Liberia. While Pupo speaks English fluently, she speaks with a noticeable Liberian accent.

13. Pupo performed her job in a satisfactory manner.

14. Nevertheless, Pupo and her African-born colleagues were frequently the target of discriminatory behavior from Area Director of People and Culture, Dwain Carter (“Carter”). Carter is American-born and African-American.

15. At 9:00 am on October 10, 2020 Pupo was assigned to clean Room 810.

16. When Pupo arrived at Room 810, she noticed that the bed had been sat on and that the bathroom had been used – with two used bath towels on the floor, a wet bathmat, a wet shower, and a recently used, but unflushed toilet. Pupo spent approximately thirty minutes cleaning the room, which included Pupo performing tasks such as cleaning the restroom and changing the sheets on the bed.

17. On or about October 14, 2020, Director of Housekeeping Nico Barbieri, informed Pupo that she was being suspended because she should have only changed the top sheet of the bed in Room 808 and should not have cleaned the entire room. Barbieri informed Pupo that she was being suspended pending the outcome of an investigation.



18. The following day Pupo spoke with Barbieri over the telephone. During these phone calls, Barbieri told Pupo words to the effect of “I don’t know what happened by you and [Carter] but [Carter] does not want you to come back” and “I think [Carter] has something against you.”

19. Shortly afterwards, Pupo received a phone call from Carter. During this phone call, Carter told Pupo that she was not competent to do the job and words to the effect of “the place you’re from you don’t know your job”, “you don’t know how to do your work on time”, that people from Africa are “illiterate”, and that Pupo should speak English rather than “African.” Carter further told Pupo that she was terminated.

**COUNT I**  
**TITLE VII - RACE DISCRIMINATION**  
**42 U.S.C.A. § 2000e-2(a)**

20. Pupo incorporates the above paragraphs as if fully set forth at length herein.

21. Pupo’s status as being African-born places her in the protected class of race.

22. Pupo’s membership in a protected class was motivating factors in Defendant’s decision to terminate her employment.

23. Pupo suffered disparate treatment by Defendant, as set forth above.

24. As such, Defendant’s decision to subject Pupo to adverse employment action employment is an unlawful employment practice under 42 U.S.C. § 2000e-2(a).

25. As a proximate result of Defendant’s conduct, Pupo sustained significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages and Pupo has

also sustained work loss, loss of opportunity, and a permanent diminution of earning power and capacity and a claim is made therefore.

26. As a result of the conduct of Defendant's management, Pupo demands punitive damages.

27. Pupo demands attorney's fees and court costs under the Section 704(a) of the Title VII, 42 U.S.C. §2000e-3(a), *et seq.*

**COUNT II**  
**TITLE VII - NATIONAL ORIGIN DISCRIMINATION**  
**42 U.S.C.A. § 2000e-2(a)**

28. Pupo incorporates the above paragraphs as if fully set forth at length herein.

29. Pupo's status as being Liberian-born her in the protected class of national origin.

30. Pupo's membership in a protected class was a motivating factor in Defendant's decision to terminate her employment.

31. Pupo suffered disparate treatment by Defendant, as set forth above.

32. As such, Defendant's decision to subject Pupo to adverse employment actions is an unlawful employment practice under 42 U.S.C. § 2000e-2(a).

33. As a proximate result of Defendant's conduct, Pupo sustained significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages and Pupo has also sustained work loss, loss of opportunity, and a permanent diminution of earning power and capacity and a claim is made therefore.

34. As a result of the conduct of Defendant's management, Plaintiff demands punitive damages.



35. Plaintiff demands attorney's fees and court costs under the Section 704(a) of the Title VII, 42 U.S.C. §2000e-3(a), *et seq.*

**COUNT III**  
**TITLE VII - HARASSMENT**  
**42 U.S.C.A. § 2000e-2(a)**

36. Pupo incorporates all foregoing allegations as if they are stated in this Count in full.

37. Pupo had to endure pervasive and regular harassment from her supervisors.

38. This harassment by Pupo's managers and co-workers detrimentally affected Pupo.

39. This harassment was motivated by Pupo's race and national origin, ethnicity.

40. The harassment by Pupo's supervisor would detrimentally affect a reasonable person for all of the reason stated herein, as the harassment and its results would cause decreased wages, pain, lost wages, and embarrassment and humiliation to a reasonable person.

41. The harassment of Pupo by Defendant's management was willful and intentional.

42. This willful, intentional, and unlawful harassment and discrimination violates the laws and regulations of the United States, including without limitation, 42 U.S.C § 2000e, *et seq.*

43. As a proximate result of Defendant's conduct, Pupo sustained significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages and Pupo also sustained work loss, loss of opportunity, and a permanent diminution of earning power and capacity and a claim is made therefore.

**COUNT IV**  
**SECTION 1981 - DISCRIMINATION**  
**42 U.S.C. § 1981**

44. Pupo incorporates the above paragraphs as if fully set forth at length herein.

45. Defendant took adverse action against Pupo by unfairly and unequally curtailing her compensation on account of her race as well as creating a hostile work environment in an attempt to drive her from employment with Defendant.

46. Pupo's status as being Liberian places her in the protected class of race.

47. Pupo's membership in a protected class was a motivating factor in Defendant's decision to subject Pupo to adverse employment actions.

48. Pupo suffered disparate treatment by Defendant, as set forth above.

49. Defendant subjected Pupo to intentional discrimination based on her race, ancestry, and ethnic characteristics. Specifically, Defendant's intentional discrimination was based on the fact that Pupo was born in Liberia.

50. Defendant's decision to harass Pupo and to subject her to adverse employment actions is an unlawful employment practice under 42 U.S.C. § 1981.

51. As a proximate result of Defendant's conduct, Pupo sustained significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages and Pupo also sustained work loss, loss of opportunity, and a permanent diminution of earning power and capacity and a claim is made therefore.

**COUNT V**  
**PENNSYLVANIA HUMAN RELATIONS ACT**  
**43 P.S. § 951**

52. Pupo incorporates all the preceding paragraphs as if they were set forth at length herein.

53. Based on the foregoing, Pupo alleges that Defendant violated the Pennsylvania Human Relations Act (“PHRA”) by subjecting her to discrimination on the basis of her race, color and national origin.

54. Defendant’s conduct caused Pupo to sustain significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, loss of tips as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages and Pupo has also sustained work loss, loss of opportunity, and a permanent diminution of her earning power and capacity and a claim is made therefore.

55. Pursuant to the Pennsylvania Human Relations Act, 43 P.S. § 951, *et seq.* Pupo demands attorneys’ fees and court costs.

**COUNT I**  
**PHILADELPHIA FAIR PRACTICES ORDINANCE**  
**Philadelphia Code §9-1100**

56. Pupo incorporates all the preceding paragraphs as if they were set forth at length herein.

57. Based on the foregoing, Pupo alleges that Defendant violated the Philadelphia Fair Practices Ordinance (“PFPO”) by subjecting her to discrimination on the basis of her race, color and national origin.

58. Defendant’s conduct caused Pupo to sustain significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, loss of tips as well as emotional distress, mental

anguish, humiliation, pain and suffering, consequential damages and Pupo has also sustained work loss, loss of opportunity, and a permanent diminution of her earning power and capacity and a claim is made therefore.

59. Pursuant to the Pennsylvania Human Relations Act, 43 P.S. § 951, *et seq.* Pupo demands attorneys' fees and court costs.

**WHEREFORE**, Plaintiff, Victoria Pupo, demands judgment in her favor and against Defendant, in an amount in excess of \$150,000.00 together with:

- A. Compensatory damages, including but not limited to: back pay, front pay, past lost wages, future lost wages. Lost pay increases, lost pay incentives, lost opportunity, lost benefits, lost future earning capacity, injury to reputation, mental and emotional distress, pain and suffering
- B. Attorneys' fees and costs of suit;
- C. Punitive damages;
- D. Interest, delay damages; and,
- E. Any other further relief this Court deems just proper and equitable.

**LAW OFFICES OF ERIC A. SHORE, P.C.**

BY: /s/ Brian M. Doyle (PA Id. 319475)  
**BRIAN M. DOYLE, ESQUIRE**  
Two Penn Center  
1500 JFK Boulevard, Suite 1240  
Philadelphia, PA 19102  
Attorney for Plaintiff, Victoria Pupo

Date: 9/23/2021

**VERIFICATION**

I hereby verify that the statements contained in this complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 P.A.C.S § 4904, relating to unsworn falsification to authorities.

09/23/2021

                      
Date

Electronically Signed 2021-09-23 14:46:56 UTC - 69.253.62.186  
AssureSign®  
86483af0-230a-4e94-b651-adac00ef827e

Victoria Pupo